

IT IS SO ORDERED.

The default standard for discovery of electronically-stored information
is modified as outlined.

George J. Limbert-03/29/17 IN THE UNITED STATES DISTRICT COURT
U.S. MAGISTRATE JUDGE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

JOHN DOE,)	CASE NO. 5:17-cv-323
)	
Plaintiff,)	JUDGE SARA LIOI
)	
v.)	MAGISTRATE JUDGE GEORGE LIMBERT
)	
COLLEGE OF WOOSTER,)	
)	
Defendant.)	
)	

JOINT PROPOSAL CONCERNING ELECTRONIC DISCOVERY

NOW COME Plaintiff and Defendant, by and through their undersigned counsel, to hereby
submit this Joint Proposal Concerning Electronic Discovery, pursuant to this Court's Order filed
March 7, 2017.

The parties intend to comply with this Court's Default Standard for Discovery of
Electronically Stored Information ("ESI"), but wish to modify that Standard in the following
respects:

1. The parties have minimal amounts of ESI, consisting mostly of emails, so shall be
relieved from the obligations of identifying custodians and the individual designated as being most
knowledgeable, listing and providing descriptions and other information concerning relevant
electronic systems and appointing e-discovery and retention coordinators, but shall take reasonable
measures to retain any discoverable ESI they may have.

{01019756-1}

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Joint Proposal Concerning Electronic Discovery has been filed electronically on this 28th day of March, 2017. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties not receiving service through the Court's electronic filing system will be served by regular U.S. mail. Parties may access this filing through the Court's system.

/s/ Kristina W. Supler

Kristina W. Supler (#0080609)